

JEFFREY BUCHOLTZ  
Principal Deputy Assistant Attorney General  
R. MICHAEL UNDERHILL  
Attorney in Charge, West Coast Office  
GEOFFREY D. OWEN  
Trial Attorney  
Torts Branch, Civil Division  
U.S. Department of Justice  
7-5395 Federal Bldg., Box 36028  
450 Golden Gate Avenue  
San Francisco, California 94102-3463  
Telephone: (415) 436-6648  
[mike.underhill@usdoj.gov](mailto:mike.underhill@usdoj.gov)

RONALD J. TENPAS  
Acting Assistant Attorney General  
Environment and Natural Resources Division  
United States Department of Justice  
Washington D.C. 20530  
BRADLEY R. O'BRIEN  
Environmental Enforcement Section  
United States Department of Justice  
301 Howard Street, Suite 1050  
San Francisco, California 94105  
Telephone: (415) 744-6484; Facsimile: (415) 744-6476  
[brad.o'brien@usdoj.gov](mailto:brad.o'brien@usdoj.gov)

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHELSEA, LLC, et al.,	)	Civil No. C07-5800-SC
	)	
Plaintiffs,	)	
	)	NOTICE OF RELATED CASE:
v.	)	
	)	<u>Case No. C07-6045-SI</u>
REGAL STONE LIMITED, <i>et al, in personam,</i>	)	
M/V COSCO BUSAN, her engines, tackle, <i>etc., in</i>	)	
<i>rem,</i>	)	
	)	
Defendants.	)	

In accordance with Local Rule 3-12, the United States of America hereby files this Notice specifying that this matter may potentially constitute a related case to *UNITED STATES OF AMERICA v. M/V COSCO BUSAN, LR/IMO Ship No. 9231743, her engines, apparel, electronics, tackle, boats, appurtenances, etc., in rem, REGAL STONE LIMITED, et al., in personam*. CV-07-6045-SI (N.D. Cal.).

Both actions arise from the November 7<sup>th</sup> oil spill involving the M/V COSCO BUSAN (the “Vessel”). The action filed by the United States includes maritime lien claims against the Vessel *in rem*, those claims based upon express statutory rights granted by Congress under the National Marine Sanctuaries Act (“NMSA”), 16 U.S.C. § 1443, and the Park System Resource Protection Act (“PSRPA”), 16 U.S.C. § 19jj-1(b). The United States’ action also asserts statutory *in personam* claims against, *inter alia*, defendant Regal Stone Limited.

Though not based upon the foregoing statutes (neither of which provide a private cause of action), the plaintiffs’ pleadings and related papers in case number CV-07-5800-SC purport to assert what appears to be a tort-based maritime lien claim against the Vessel, as well as various *in personam* claims against, *inter alia*, defendant Regal Stone Limited.

Dated: November 30, 2007.

JEFFREY BUCHOLTZ  
Principal Deputy Assistant Attorney General

/s/ R. Michael Underhill  
R. MICHAEL UNDERHILL  
Attorney In Charge, West Coast Office  
GEOFFREY D. OWEN  
Trial Attorney  
Torts Branch, Civil Division  
U.S. Department of Justice

RONALD J. TENPAS  
Acting Assistant Attorney General  
Environment and Natural Resources Division  
BRADLEY R. O’BRIEN  
Environmental Enforcement Section

Attorneys for Plaintiff United States of America